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**From:** Sonawane, Bob [Sonawane.Bob@epa.gov]  
**Sent:** 6/27/2013 3:31:49 PM  
**To:** Bale, Ambuja [Bale.Ambuja@epa.gov]; Bateson, Thomas [Bateson.Thomas@epa.gov]; Dannan, Ghazi [Dannan.Ghazi@epa.gov]; Euling, Susan [Euling.Susan@epa.gov]; Glenn, Barbara [Glenn.Barbara@epa.gov]; Guyton, Kate [Guyton.Kate@epa.gov]; Gwinn, Maureen [gwinn.maureen@epa.gov]; Keshava, Nagalakshmi [Keshava.Nagu@epa.gov]; Kraft, Andrew [Kraft.Andrew@epa.gov]; Keshava, Nagalakshmi [Keshava.Nagu@epa.gov]; Lin, Yu-Sheng [Lin.Yu-Sheng@epa.gov]; Makris, Susan [Makris.Susan@epa.gov]; Nath, Raghu [Nath.Raghu@epa.gov]; Segal, Deborah [Segal.Deborah@epa.gov]; Vulimiri, Suryanarayana [Vulimiri.Sury@epa.gov]  
**CC:** Scott, Cheryl [Scott.Cheryl@epa.gov]  
**Subject:** Comments from the ACC on the NRC materials, including the draft Handbook  
**Attachments:** ACC and ARASP Comments to EPA on the IRIS Submission to NRC.pdf

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**From:** Beck, Nancy [mailto:Nancy\_Beck@americanchemistry.com]  
**Sent:** Monday, June 24, 2013 12:21 PM  
**To:** Olden, Kenneth  
**Cc:** Cogliano, Vincent; Flowers, Lynn; Kavlock, Robert; Dominic Mancini [Ex. 6 Personal Privacy (PP)]; Kimberly\_Wise@americanchemistry.com  
**Subject:** ACC and ARASP Comments on the EPA Jan 30th Submission to NAS

Dear Dr. Olden,

On behalf of ACC and ARASP attached are comments on the IRIS January 30<sup>th</sup> Submission to the NRC IRIS Review Committee. We have provided general comments regarding needed progress in the IRIS program as well as and comments specific to the January 30<sup>th</sup> submission—which includes a detailed set of comments on each chapter of the EPA submission, including the IRIS handbook.

ACC and ARASP support EPA's activities to improve the IRIS Program and to ensure that the Program produces high quality, scientifically sound chemical assessments. We also commend EPA's efforts to improve its IRIS Program's documentation and enhance consistency and transparency in the Agency's approach to develop hazard assessments as presented in the EPA

Submission to the NAS IRIS Review Committee. However, as noted in our attached comments, there are still opportunities for EPA to improve and refine its processes.

While the IRIS Program has indicated EPA is accepting comments on the documents submitted to the NAS IRIS Committee, the comment period was not formally announced, nor was a docket created to receive submission of detailed comments and attachments. We recommend EPA create a docket on regulations.gov and announce a formal 60-day comment period via the Federal Register. In addition, we would like there to be an open public meeting to discuss the EPA's Draft Handbook for IRIS Assessment Development, to encourage further public input and robust discussion into the EPA revisions to the IRIS Program. Finally, the IRIS handbook and associated documents should be treated as economically significant guidance documents subject to the requirements of the OMB Final Bulletin for Agency Good Guidance Practices and subject to review by the Office of Information and Regulatory Affairs under Executive Orders 12866 and 13563.

We thank you in advance for the consideration you and the IRIS team will give to our comments and suggestions. Please don't hesitate to contact me if you have any questions.

Regards,  
Nancy

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Nancy B. Beck, Ph.D., DABT

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